



5. Plaintiff has been very ill recently and was in the hospital. Counsel has been unable to communicate with him. Counsel respectfully requests the Court to extend the deadline under Local Civil Rule 7 for Plaintiff to file his response and memoranda in opposition to Defendants' motion, and to allow Plaintiff to file his response on or before February 3, 2020.

6. Plaintiff's counsel conferred with counsel for Defendants about the request for an extension.

7. On January 27, 2020, Defendants' counsel (Ms. Prather) indicated that Defendants do not oppose Plaintiff's request, provided that there is a comparable extension of the deadline for Defendants to file their reply to Plaintiff's opposition, which (because of the Federal holiday on February 17) would make Defendants' reply due on February 18, 2020. Plaintiff's counsel is agreeable.

8. No party would be prejudiced by the extensions of the respective deadlines.

9. A proposed Order, granting the requested relief, agreed to by counsel for the parties is attached, as Exhibit "A".

WHEREFORE, Plaintiff respectfully requests the Court to enter an Order (1) granting Plaintiff's motion to extend the deadlines under Local Civil Rule 7; (2) providing Plaintiff with an extension of time to file his responses and memoranda in opposition to Defendants' motion to compel [*ECF No. 87*] to and including February 3, 2020 and Defendants with an extension of time to file their reply to Plaintiff's response

and memorandum in opposition to and including February 10, 2020; and (3) awarding such further relief as the Court deems proper.

DATED: January 29, 2020

ED BUTOWSKY,  
In his Individual and Professional Capacities

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 29, 2020 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel for Defendants and all interested parties receiving notices via CM/ECF, and a copy was also emailed in PDF to counsel for the Defendants.

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